2/27/98

Docket #: TMD -94-00-2 Topic: NATIONAL LIST

MAR 24 PH4:02

Sec.: 205.26 / Non-agricultural (non-organic) substances allowed as ingredients in or on processed products labeled as organic or made with certain organic ingredients.

Attention USDA, please don't accept section 205.26 as written!

I do not wish to worry about what I am purchasing, always being concerned with reading small print to find out if my Organic wine is free of added sulfites.

This seems like deceptive labeling. I am a consumer asking you not to lower standards in Organic wine processing, which allowing up to 100 ppm. sulfur dioxide added to wines made from organically grown grapes, would do.

I enjoy Organic wines without added sulfites. I know that sulfites can occur naturally, but that they are usually in very small amounts. I understand that over one million people in this country have documented sensitivity to sulfites and that there are many more undocumented cases. Yet most of these people can enjoy unsulfited wine. People may buy a bottle of wine they thought was Organic (without added sulfur dioxide), but had added sulfur dioxide and get very sick, all because the label was misleading.

Wines made with organically grown grapes should be labeled as such, but should NOT be considered Organic wine if they contain any amount of added sulfur dioxide. I believe that Organic should mean without synthetic additives or preservites both in the growing AND in the processing. There should be no exceptions to this.

Allowing up to 100 ppm. added sulfur dioxide may be good for some wineries that want to call their wines made from organically grown grapes, Organic wine, but it is very unfair to me as a consumer. There are more consumers than wineries.

I ask again that you remove the 100 ppm. allowable added sulfur dioxide in wine, from the Allowable Ingredients List in the National Organic Proposed Rule.

Thank you for taking my request into full consideration.